

EXHIBIT B
Itemization of Fees

1201 Third Avenue, Suite 4900
Seattle, Washington 98101
Phone: 206.359.8000

Email: clientacct@perkinscoie.com
Accounting: 206.359.3143
Fax: 206.359.9000

PERKINScoie

Jack McDonnell, Esq.
Attn: Brian Crowley
McDonnell Crowley, LLC
115 Maple Avenue
Suite 201
Red Bank, NJ 07701

Invoice No. 6412629
Matter No. 085206.0010
Bill Date June 22, 2021
Due Date Due Upon Receipt

INVOICE SUMMARY

Re: 085206.0010 / Elia and Mariana Zois

For Professional Services rendered through June 21, 2021

Services	\$174,300.00
Disbursements and Other Services	\$10,931.92
Total Invoice Amount	\$185,231.92

INFORMATION MAY BE SUBJECT TO CLIENT ATTORNEY AND/OR ATTORNEY WORK PRODUCT PRIVILEGE

REMITTANCE INSTRUCTIONS

Payment Due in US Currency
Tax Identification Number.: 91-0591206

Please identify your payment with the following: Perkins Coie Account No. 085206 and Invoice 6412629

<u>CHECKS:</u>	<u>ACH / WIRE TRANSFERS IN USD:</u>
Perkins Coie LLP Attn: Client Accounting PO Box 24643 Seattle, WA 98124-0643	Bank: US Bank 1420 Fifth Avenue Seattle, WA ABA # 125000105 Swift Code # US BK US 44I MT Account Name: Perkins Coie LLP Account Number: 1 535 5592 1235

Client Privacy Policy. We collect or receive information in the ordinary course of providing legal services to you, including personal information. For more information about how we collect, use, and disclose personal information in connection with our legal representation of clients, please review our Client Privacy Policy, which can be accessed here: <https://www.perkinscoie.com/en/client-privacy-policy.html>.

After 30 days, a monthly late charge of 1% per month from the invoice date (or such lower rate as required by applicable law) will be due. Should a collection action or proceeding be necessary, attorneys' fees and costs for such collection effort will also be due.

Invoice No. 6412629
Jack McDonnell, as Chapter 7 Trustee
085206.0010 / Elia and Mariana Zois

PERKINScoie

Professional Services through 06/21/2021

Date	Attorney / Assistant	Description of Service	Hours
09/03/2019	J. Vanacore	Initial review of Rule 2004 issues and resolve same;	0.40
09/03/2019	J. Vanacore	Prepare for meeting with United States attorney;	0.30
09/03/2019	J. Vanacore	Preparation for meeting with United States attorney with Deb Kennedy;	0.40
09/03/2019	J. Vanacore	Review and revise retention application; work with Bonnie Figner regarding same;	0.20
09/03/2019	D. Kennedy	Prepare retention documents (1.2); communication regarding same, including service information (.4);	1.60
09/04/2019	J. Vanacore	Finalize retention issues; resolve issues raised by Court; work with Trustee regarding same;	0.30
09/04/2019	J. Vanacore	Prepare for meeting with United States attorney in Newark, New Jersey;	0.40
09/04/2019	D. Kennedy	Prepare for meeting with AUSA/IRS/OUST, including review of relevant court documents and related information;	10.60
09/05/2019	J. Vanacore	Initial preparation for meeting with Assistant United States attorney;	0.70
09/05/2019	J. Vanacore	Attend meeting in Newark, New Jersey with Chapter 7 Trustee, various governmental agency attorneys and Assistant United States attorneys for New Jersey and Wisconsin regarding initial referral issues; strategy meeting with Chapter 7 Trustee and counsel prior and subsequent to meeting;	5.90
09/05/2019	D. Kennedy	Attend meeting in Newark, NJ with Assistant US Attorney (WI and NJ), IRS and UST regarding referral and related issues (1.8); strategy meeting with Chapter 7 Trustee and co-counsel prior to and following same (4,1);	5.90
09/06/2019	D. Kennedy	Travel to Denver following meeting with AUSA/IRS/OUST, including review of documents and notes relevant to same;	7.20
09/09/2019	J. Vanacore	Telephone conference and emails with B. Crowley regarding conflict waiver;	0.20
09/09/2019	J. Vanacore	Review and revise language on conflict waiver;	0.20
09/09/2019	J. Vanacore	Emails and telephone conference with Eric Van Horn regarding conflict waiver;	0.20
09/09/2019	J. Vanacore	Telephone conference with B. Crowley regarding conflict waiver issues;	0.20
09/10/2019	J. Vanacore	Resolve initial Atrium issues; emails with B. Crowley; strategy regarding next steps;	0.30
09/10/2019	J. Vanacore	Telephone conference with B. Crowley regarding case update;	0.10
09/10/2019	J. Vanacore	Review objection to retention filed by Zios; strategy regarding same;	0.20

Invoice No. 6412629
Jack McDonnell, as Chapter 7 Trustee
085206.0010 / Elia and Mariana Zois

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
09/10/2019	D. Kennedy	Review Bederson report in connection with potential Alter Ego claims and prepare memo regarding elements of proof related to same;	4.20
09/11/2019	J. Vanacore	Emails with H. Randolph-Haynes regarding initial Zios issues;	0.10
09/11/2019	J. Vanacore	Review and revise Pro Hac Vice application;	0.20
09/11/2019	J. Vanacore	Provide instructions to paralegal on general service issues; review same;	0.20
09/11/2019	J. Vanacore	Draft confidentiality agreement; review and revise same;	0.40
09/11/2019	J. Vanacore	Emails with B. Crowley regarding initial Atrium case issues;	0.10
09/11/2019	J. Vanacore	Telephone conference with B. Crowley regarding initial Atrium case issues; review same;	0.20
09/11/2019	D. Kennedy	Review Objection to PC Retention Application (.3); teleconference with B. Crowley regarding same and strategy for financial discovery (.4); prepare outline for Response to Zois Objection to PC Retention and begin drafting same (1.8); correspondence related to pro hac vice applications (.5); revise draft of same (.4);	3.40
09/11/2019	R. Leibowitz	Prepare and revise applications to appear pro hac vice, certifications, and proposed orders for D. Kennedy and J. Miller and file same;	1.80
09/13/2019	R. Leibowitz	Pursuant to instructions from clerk's office, prepare certificate of service of pro hac applications and arrange for service of same (.6); prepare appearance form for J. Vanacore (.2); upon confirmation of service, file appearance and certificate of service in case (.2);	1.00
09/16/2019	J. Vanacore	Initial review of answer to adversary proceeding complaint;	0.40
09/16/2019	J. Vanacore	Initial review of outline to respond to Zios objection;	0.20
09/16/2019	J. Vanacore	Emails with B. Crowley regarding confidentiality agreement;	0.10
09/17/2019	J. Vanacore	Telephone conference with B. Crowley regarding conflict letter; emails regarding same; review same;	0.20
09/18/2019	J. Vanacore	Telephone conference with B. Crowley regarding initial case issues;	0.30
09/18/2019	J. Vanacore	Emails with B. Crowley regarding confidentiality agreement;	0.10
09/18/2019	J. Vanacore	Brief review of response to Objection to retention;	0.20
09/18/2019	D. Kennedy	Prepare Response to Zois Objection to PC Retention Application (2.4); correspondence with co-counsel regarding same (.3);	2.70
09/19/2019	J. Vanacore	Telephone conference with H. Randolph-Haynes, E. Van Horn and B. Crowley regarding initial case issues;	0.50
09/19/2019	D. Kennedy	Review communications regarding subpoenas and related strategy;	0.60
09/23/2019	D. Kennedy	Finalize and file Response to Zois Objection to PC Retention Application	1.20

Invoice No. 6412629
Jack McDonnell, as Chapter 7 Trustee
085206.0010 / Elia and Mariana Zois

PERKINS COIE

Date	Attorney / Assistant	Description of Service	Hours
		(.6); review Trustee's Reply in Support of PC Retention Application (.4); correspondence with B. Crowley and R. Leibowitz re: same (.2);	
09/23/2019	R. Leibowitz	Verify service of responses (docket nos. 65 and 66), and file certificate of service;	0.20
09/23/2019	R. Leibowitz	Finalize and e-file Perkins Coie's response to objection to motion to employ, compile and arrange for service of Trustee's response and Perkins Coie's response, and prepare certificate of service to be filed;	0.40
09/24/2019	R. Leibowitz	Upon entry of orders granting pro hac vice applications, download same and prepare and submit check request for court fees (.2); mail check and orders to court (.1);	0.30
09/26/2019	R. Leibowitz	Follow-up regarding check for pro hac vice appearance fees and send same to New Jersey US District Court;	0.20
10/01/2019	J. Vanacore	Review objection to Perkins retention; review same; emails with B. Crowley; review Court decision regarding same;	0.20
10/02/2019	D. Kennedy	Prepare 2004 Subpoenas for prepetition/postpetition payment recipients (Mind Gamz) (1.8); related correspondence (.3); teleconference with B. Crowley regarding strategy for 2004 depositions and upcoming mediation (.6);	2.70
10/02/2019	R. Leibowitz	Coordinate preparation of mail merge for 2004 exam subpoenas and correspondence (multiple) regarding same (.8); prepare subpoenas and cover letters for four parties to be served by Bederman and locate specific subpoena/legal addresses for same (.9);	1.70
10/03/2019	J. Vanacore	Review retention issues, emails with B. Crowley regarding same;	0.10
10/03/2019	J. Vanacore	Work with D. Kennedy on subpoena issues;	0.20
10/03/2019	J. Miller	Call with D. Kennedy regarding alter ego research;	0.20
10/03/2019	R. Leibowitz	Review draft letters accompanying subpoena and subpoena, send follow-up questions/revision requests to document preparer, along with updated mailing list (.6); conference regarding same (.2); final review and revisions to same and correspondence (multiple) to coordinate mailing of same (.6);	1.40
10/04/2019	R. Leibowitz	Prepare cover letter and send hard copies of subpoenas and riders to Debtors' attorney;	0.40
10/07/2019	J. Vanacore	Initial review of subpoena issues, review same;	0.20
10/07/2019	D. Kennedy	Review correspondence in response to 2004 subpoenas, including teleconferences with third parties regarding same (1.8); correspondence with B. Crowley regarding same and related strategy (.4);	2.20
10/10/2019	J. Vanacore	Initial preparation for deposition and review of documents;	0.40
10/10/2019	J. Vanacore	Research on potential exposure in 2004 to fees to address issues raised by opposing counsel; draft summary of same;	0.30

Invoice No. 6412629
Jack McDonnell, as Chapter 7 Trustee
085206.0010 / Elia and Mariana Zois

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
10/10/2019	D. Kennedy	Various communications with third parties in response to Subpoenas, including review of responsive documents (1.4); correspondence with internal team regarding same (.3);	1.70
10/10/2019	J. Miller	Research alter ego under New Jersey law (1.2); call with D. Kennedy regarding same (.1);	1.30
10/11/2019	J. Vanacore	Review Valley National Bank issues; emails with B. Crowley regarding same;	0.20
10/11/2019	D. Kennedy	Review communications related to third party subpoenas (.9); update chart related to same (.4);	1.30
10/11/2019	R. Leibowitz	Receive one returned subpoena with forwarding address, revise letter and subpoena, and resend to forwarding address (.4); coordinate copy to be sent via certified mail with return receipt requested (.1);	0.50
10/14/2019	D. Kennedy	Review documents received in connection with third party subpoenas, including related communications;	1.40
10/14/2019	J. Miller	Draft memorandum regarding alter ego;	0.30
10/15/2019	J. Vanacore	Work with D. Bernard regarding Duggal issues; review same;	0.20
10/15/2019	D. Kennedy	Review documents received in connection with third party subpoenas, including related communications;	1.70
10/15/2019	J. Miller	Draft memorandum regarding alter ego under New Jersey law;	3.60
10/16/2019	J. Vanacore	Review alter ego memorandum and strategy regarding same;	0.40
10/16/2019	D. Kennedy	Review documents received in connection with third party subpoenas, including related communications;	2.10
10/17/2019	D. Kennedy	Review documents received in connection with third party subpoenas, including related communications (1.8); prepare additional third party subpoenas based on new contact information (.8);	2.60
10/17/2019	R. Leibowitz	Prepare revised letters and subpoenas, along with return receipt labels for four returned as undeliverable and one additional party;	1.20
10/18/2019	J. Vanacore	Initial review of subpoena issues;	0.20
10/18/2019	D. Kennedy	Collect and review documents from third party subpoenas (1.3); prepare status update and excel spreadsheet in connection with all outstanding subpoenas and related document collection (2.1);	3.40
10/21/2019	J. Vanacore	Prepare for Friday depositions; telephone conference with court reporter regarding same;	0.30
10/21/2019	D. Kennedy	Continue to review and collect documents from third party subpoenas, including related correspondence and teleconferenes (1.1); begin preparation for deposition outline for 2004 examinations scheduled for 10/25 (2.7);	3.80

Invoice No. 6412629
Jack McDonnell, as Chapter 7 Trustee
085206.0010 / Elia and Mariana Zois

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
10/22/2019	J. Vanacore	Telephone conference with Jamie Danowski regarding depositions issues; review issues regarding same;	0.20
10/22/2019	J. Vanacore	Prepare for depositions; review spreadsheet summarizing same;	0.30
10/22/2019	J. Vanacore	Brief review of financial statement issues; emails with B. Crowley regarding same;	0.20
10/22/2019	J. Vanacore	Resolve deposition issues; follow-up regarding same;	0.20
10/23/2019	J. Vanacore	Final preparation for depositions;	0.20
10/23/2019	J. Vanacore	Review deposition questions and issues; review deposition outline to prepare for same;	0.40
10/23/2019	D. Kennedy	Prepare and revise deposition outlines for upcoming 2004 examinations (3.2); continued communications with parties regarding document production and deposition scheduling (.7);	3.90
10/23/2019	R. Leibowitz	Locate legal noticing addresses for Paypal and Venmo;	0.20
10/24/2019	J. Vanacore	Prepare for depositions; work with B. Crowley and D. Kennedy regarding same;	0.40
10/24/2019	D. Kennedy	Continue to prepare for upcoming 2004 depositions, including revisions to deposition outlines and correspondence with B. Crowley and J. Vanacore regarding same (8.2); correspondence with T. Rees regarding The Hill School deposition, including teleconference logistics (.4);	8.60
10/25/2019	J. Vanacore	Work with D. Kennedy on deposition issues;	0.40
10/25/2019	J. Vanacore	Meeting with Trustee's counsel prior and subsequent to depositions to review and prepare avoidance action strategy;	2.60
10/25/2019	J. Vanacore	Follow-up meetings with Trustee's counsel;	0.40
10/25/2019	J. Vanacore	Initial research on Valley claims; email with D. Kennedy regarding same;	0.60
10/25/2019	D. Kennedy	Finalize preparations for and take 2004 depositions of The Hill School, Manhattan Skyline Mgmt, and FPCNS (4.7); meeting with B. Crowley and J. Vanacore following depositions regarding strategy (1.8); review additional document production from THS (.8); travel to Denver following depositions, including review of research and communications related to cause of action related to VNB (6.8);	13.60
10/28/2019	D. Kennedy	Review additional documents provided in response to 2004 subpoenas (1.2); teleconference with representative from 8D Holdings (.2);	1.40
10/29/2019	D. Kennedy	Prepare memorandum regarding potential cause of action against VNB, including evidentiary requirements;	3.60
10/30/2019	D. Kennedy	Continue preparation memorandum regarding potential cause of action against VNB, including evidentiary requirements (2.6); continue to review 2004 subpoena document productions (1.1);	3.70

Invoice No. 6412629
Jack McDonnell, as Chapter 7 Trustee
085206.0010 / Elia and Mariana Zois

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
10/31/2019	R. Leibowitz	Prepare cover letter and subpoena duces tecum for Transamerica Life Insurance Company and arrange for service via certified mail with return receipt requested and first class mail;	0.80
11/01/2019	D. Kennedy	Continue preparation of memorandum detailing potential cause of action based on banking violations;	2.40
11/04/2019	J. Vanacore	Brief review of master settlement agreement; review and revise same; emails with trustee regarding same;	0.20
11/05/2019	D. Kennedy	Review depositions transcripts (THS, Manhattan Skyline) in connection with litigation strategy (1.8); updates status chart re: subpoena responses and document production (.6); correspondence re: VNB deposition subpoena (.2);	2.60
11/06/2019	J. Vanacore	Work with D. Kennedy on Valley National Bank subpoena issues; review same;	0.20
11/06/2019	R. Leibowitz	Prepare and serve 2004 deposition-only subpoena to Valley National Bank;	0.50
11/11/2019	D. Kennedy	Review document production from 8D Holdings, including correspondence with Trustee's professionals regarding same (.9); communications with Porsche America regarding subpoena and related production (.3); review proposed confidentiality agreement (St Luke's) and correspondence with J. Bentley regarding same (.4);	1.60
11/12/2019	D. Kennedy	Teleconference with J. Bentley regarding proposed protective order/documents production (St. Lukes), including review of related documents;	0.70
11/14/2019	J. Vanacore	Brief review of status of litigation issues, work with D. Kennedy regarding same;	0.20
11/14/2019	D. Kennedy	Lengthy teleconference with P. Hollander regarding R. Khawley subpoena and related issues (.6); review correspondence from Prudential regarding subpoena, including followup request to C. Phillips regarding same (.3);	0.90
11/14/2019	D. Kennedy	Prepare serve subpoena (N. Nova) (.5); teleconference with B. Crowley regarding strategy (.3); correspondence with J. Bentley regarding request for protective order (.2); teleconference with T. Karchner regarding 8D Property Holdings document production and deposition subpoena (.4);	1.40
11/15/2019	D. Kennedy	Continue review of document production and deposition transcripts in connection with potential chapter 5 claims, including preparing memo regarding strategy related to same	1.60
11/19/2019	J. Vanacore	Review initial Valley Bank litigation issues, strategy regarding same;	0.20
11/20/2019	D. Kennedy	Review correspondence from Mercedes Benz in connection with document subpoena (.1);	0.10
11/21/2019	D. Kennedy	Prepare correspondence to Prudential regarding subpoena response and related issues (.2); review documents from C. Phillips regarding same (.1); correspondence with B. Crowley regarding strategy (.1);	0.40

Invoice No. 6412629
Jack McDonnell, as Chapter 7 Trustee
085206.0010 / Elia and Mariana Zois

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
11/24/2019	D. Kennedy	Conference call with B. Crowley and C. Phillips regarding mediation and related litigation strategy;	0.70
11/26/2019	D. Kennedy	Review additional discovery documents and update status chart regarding same;	1.60
12/02/2019	D. Kennedy	Review documents produced by Porsche, Prudential, Mercedes, and 8D Holdings (1.1);	1.10
12/03/2019	D. Kennedy	Correspondence with VNB regarding records certification and testimony subpoena (.3); correspondence with B. Crowley regarding same and related strategy (.2);	0.50
12/03/2019	D. Kennedy	Review correspondence from Bederson regarding personal AmEx charges (.3); prepare communication regarding potential strategy in connection with credit card payments (.3);	0.60
12/05/2019	J. Vanacore	Telephone conference with B. Crowley and D. Kennedy regarding mediation and adversary proceeding issues;	0.30
12/05/2019	D. Kennedy	Teleconference with K. Grossman regarding Prudential document production and related issues (.4); correspondence with B. Crowley and C. Phillips regarding same (.1); teleconference with J. Vanacore regarding status of litigation and related matters (.4);	0.90
12/06/2019	J. Vanacore	Teleconference with B. Crowley regarding litigation and mediation issues; review same;	0.30
12/13/2019	D. Kennedy	Review amended schedules, including correspondence from B. Crowley and C. Phillips regarding same (.8); review documents received in discovery in connection with amended schedules (.9);	1.70
12/16/2019	D. Kennedy	Correspondence with B. Crowley and C. Phillips regarding Discover Bank and Prudential document production (.2); review same (.4);	0.60
12/23/2019	D. Kennedy	Review revised Settlement Agreement and correspondence from B. Crowley and C. Phillips regarding same (.6);	0.60
01/08/2020	J. Vanacore	Review draft settlement agreement, emails with Trustee regarding same;	0.40
01/09/2020	D. Kennedy	Review and revise Stipulation and Consent Order (1.4); correspondence with B. Crowley regarding same (.1);	1.50
01/15/2020	J. Vanacore	Telephone conference with B. Crowley regarding update on Valley issues;	0.20
01/15/2020	J. Vanacore	Follow-up emails with B. Crowley regarding Valley issues; review same;	0.20
01/20/2020	J. Vanacore	Review settlement agreement issues; emails with B. Crowley and C. Phillips regarding same;	0.20
01/21/2020	J. Vanacore	Review settlement agreement issues; work with D. Kennedy regarding same;	0.20
01/21/2020	D. Kennedy	Review communications related to settlement agreement and debtors' 2004	2.90

Invoice No. 6412629
Jack McDonnell, as Chapter 7 Trustee
085206.0010 / Elia and Mariana Zois

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
		examination (.3); revise settlement document (.5); begin preparations for 2004 examination, including review of financial records (2.1);	
01/24/2020	D. Kennedy	Prepare outline for 2004 examination (Elia and Mariana Zois), including review and preparation of exhibits related to same;	6.50
01/28/2020	J. Vanacore	Prepare for depositions of debtors, review issues;	0.40
01/28/2020	D. Kennedy	Prepare for 2004 examination, including revisions to outline and review/preparation of exhibits;	8.80
01/29/2020	J. Vanacore	Attend deposition of Mr. Zois; meeting with trustee's counsel;	0.90
01/29/2020	D. Kennedy	Prepare for and take 2004 examination of Elia Zois;	7.50
01/30/2020	D. Kennedy	Travel from NYC following 2004 examination (E. Zois), including preparation of follow-up items and memo re: same;	7.60
02/11/2020	D. Kennedy	Review deposition transcript (Elia Zois) in preparation for upcoming VNB deposition;	2.80
02/13/2020	D. Kennedy	Review documents and Zois deposition testimony in connection with preparation for VNB deposition (3.2); prepare outline in connection with same (1.2)	4.40
02/19/2020	D. Kennedy	Continue preparations for VNB deposition, including review of bank records and related correspondence;	2.30
02/25/2020	J. Vanacore	Review and prepare for depositions;	0.40
02/25/2020	D. Kennedy	Review documents in preparation for VNB deposition, including revisions to examination outline;	2.70
02/26/2020	D. Kennedy	Continue review of VNB document production in preparation for 2004 deposition (3.2); revise outline in connection with same (1.3); correspondence with L. Rooney regarding request for additional document production (.1); correspondence with B. Crowley and C. Phillips regarding strategy for VNB examination (.2);	4.80
02/27/2020	J. Vanacore	Initial review of Valley Bank deposition issues, emails with Valley and D. Kennedy regarding same;	0.40
03/03/2020	J. Vanacore	Strategy and review regarding private right of action against VNB;	0.40
03/03/2020	J. Vanacore	Work with D. Kennedy regarding deposition preparation, review issues regarding same;	0.30
03/03/2020	D. Kennedy	Teleconference with J. Vanacore regarding strategy for VNB deposition;	0.30
03/03/2020	D. Kennedy	Additional preparations for Valley National Bank deposition, including preparation of exhibits;	1.70
03/04/2020	D. Kennedy	Travel to New Jersey for Valley National Bank deposition, including review of and revisions to deposition outline and review of exhibits	6.80

Invoice No. 6412629
Jack McDonnell, as Chapter 7 Trustee
085206.0010 / Elia and Mariana Zois

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
		(including E. Zois deposition transcript) related to same;	
03/05/2020	D. Kennedy	Finalize preparations for and take VNB deposition, including communications with C. Phillipps and B. Crowley regarding same (3.3); travel from New Jersey following Valley National Bank deposition, including review of notes from deposition and analysis of potential causes of action/demand letter related to same (6.0);	9.30
03/10/2020	J. Vanacore	Review VNB issues, prepare for call with Trustee's counsel;	0.40
03/11/2020	J. Vanacore	Two telephone conferences with B. Crowley regarding VNB issues, review same;	0.60
03/17/2020	J. Vanacore	Review issues raised by court regarding Jeri Lee Miller withdrawal, instructions to paralegals and emails with B. Crowley regarding same;	0.20
03/25/2020	J. Vanacore	Work with D. Kennedy re VNB issues, review same;	0.40
04/28/2020	D. Kennedy	Research related to VNB deposit agreement and potential liability for failure to adhere to requirements of same (1.5); correspondence with J. Vanacore and B. Crowley regarding same and strategy for potential litigation (.3);	1.80
04/29/2020	D. Kennedy	Research related to banking regulations and breack of depository agreement (T&C), including litigation strategy related to same;	1.40
04/30/2020	D. Kennedy	Teleconference with J. Vanacore and B. Crowley regarding strategy for VNB and related issues;	1.10
05/06/2020	D. Kennedy	Prepare demand letter to VNB, including review of factual record and deposition transcripts in connection with same;	2.40
06/14/2021	R. Leibowitz	Prepare draft final fee application for Perkins Coie per J. Vanacore and D. Kennedy's request;	3.80
06/17/2021	R. Leibowitz	Complete final revisions to draft application for compensation per D. Kennedy's instructions;	0.40
Total			240.70

Services
\$174,300.00